



B. REQUEST FOR CONTINUANCE

4. Defendants, FCIC and RMA are United States agencies and are not required to file an answer until 60 days after service. Fed. R. Civ.P. 12 (a)(2) Defendants' answers are due January 20, 2014, which is after the initial pre-trial conference currently set for January 9, 2014.

C. PRAYER

5. For these reasons, Plaintiff asks the Court to continue the Initial Pre-trial Conference until after January 20, 2014.

Respectfully submitted,

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ATTORNEYS-IN-CHARGE FOR PLAINTIFF  
PARAMOUNT CITRUS PACKING COMPANY,  
LLC, as successor in interest to HEALDS  
VALLEY FARMS, INC.

**CERTIFICATE OF CONFERENCE**

I certify that on December 16, 2013, I conferred with opposing counsel, David Guerra, and he does not oppose of this motion for continuance of the initial pre-trial conference.

  
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LANCE A. KIRBY

**CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2014, I electronically filed **DEFENDANT'S UNOPPOSED MOTION FOR CONTINUANCE OF INITIAL PRE-TRIAL CONFERENCE** with the Clerk of Court using the CM/ECF system and faxed a copy of such filing to:

David Guerra, AUSA  
U.S. Attorney's Office  
1701 W. Bus. Hwy. 83, Suite 600  
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Via Facsimile # (956) 618-8016

  
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LANCE A. KIRBY